REMARKS

Claims 14-18, 20-30, and 32-40 are pending in the present application. Claims 14-18, 20-30, and 32-40 are rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent 6,009,436 (Motoyama), in view of UK Patent Application GB 2 307 571 A (Takasawa). Applicants respectfully request reconsideration in view of these remarks.

I.   Claim Amendments

Applicants have amended claims 14 and 22, 25, 28, 34 and 40. Support for the amendments can be found in FIGs. 6 and 7 and the accompanying text, which describes identifying common patterns in two documents that contain equivalent elements but with different element names. No new matter has been added by way of this amendment.

II.   103 Rejection of Claims 14-18, 20-30, and 32-40

Claim 14 recites:

> A computer executable method of converting a format of a first source document to a format of a second source document, the method comprising:
> identifying patterns common to the first and second source documents, wherein identifying patterns includes identifying an element that is common to the first and second source documents but has a different name in the first source document than in the second source document; and
> using the identified common patterns to map elements and sub-elements in the first source document to equivalent elements and sub-elements in the second source document, including mapping a first element in the first source document to a second element in the second source document based on the identified common patterns, the first element and the second element having different element names.

Motoyoma discloses mapping a first structured information format to a second structured information format using a technique that allows a user to interactively define the mapping (Abstract).

The examiner acknowledges that the primary reference Motoyoma does not disclose identifying patterns common to the first and second source documents.

The examiner then looks to the secondary reference Takasawa. Takasawa discloses a technique for automatically generating a document type definition for a plurality of sample documents. The technique involves comparing the sample documents and building a structure list for the documents (Abstract). The structure list does not include an element that is common to two of the documents but that has a different name in one of the documents than in the other. For example, FIG. 10 of Takasawa shows a structure list created from the sample documents shown in FIGs. 5-7. The last element (Cost) in the structure list only appears in one of the documents so it is not common to two of the documents. Each of the other elements in the structure list are common to all of the documents, but also have the same name in all of the documents. Thus, none of the elements in the structure list is an element that is common to two of the documents but that has a different name in one of the documents than in the other.

Claim 1 calls for identifying patterns common to the first and second source documents, wherein identifying patterns includes identifying an element that is common to the first and second source documents but has a different name in the first source document than in the second source document. Since Motoyoma fails to show identifying patterns at all and Takasawa fails to show identifying patterns wherein identifying patterns includes identifying an element that is common to the first and second source documents but has a different name in the first source document than in the second source document, the combination of Motoyoma and Takasawa does not disclose or suggest all of the limitations of claim 1.

Furthermore, even if the combination did show all the limitations, Motoyama fails to suggest any motivation to combine the automated technique of Takasawa with its methods. In fact, Takasawa teaches away from doing so by affirmatively distinguishing its methods from a known automatic software, stating that "the known software does not allow the user to interactively define the mapping." (Col. 2, lines 42-49)

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